

July 26, 2016

Via Electronic And Certified U.S. Mail

Paul Z. Myers, Ph.D.
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CAMPBELL PERRY LLC

RE: Dr. Richard Carrier -- Defamatory Allegations

Dear Dr. Myers:

Please be advised that our office has been retained by Dr. Carrier concerning false and defamatory allegations in your recent post on Freethought Blogs. You are hereby ordered to immediately **CEASE AND DESIST** making any further false and/or defamatory statements about Dr. Carrier.

It is unlawful to engage in defamation of another's character and reputation. Defamation consists of broadcast statements, that a speaker either knows to be false or makes with reckless disregard as to truth or falsity, that lower a person's esteem in the community or deter others from associating with him. Injury to reputation is presumed if the defamation concerns statements that a person is guilty of a crime involving moral turpitude, or about a person's business or profession. According to your online statements, you allege very serious charges that include sexual harassment, "repeated boundary-pushing behavior," and "persistent, obnoxious sexual behavior in defiance of specific requests that he cease," to wit:

One of our writers, Richard Carrier, has been **banned from Skepticon** for "his repeated boundary-pushing behavior". This is, obviously, a serious accusation, and we've been investigating further. We now have several first-hand reports of persistent, obnoxious sexual behavior in defiance of specific requests that he cease. We believe his accusers.

Here at Freethoughtblogs, we are sex-positive, but we are also committed to the principle of *consensual* sexual behavior. We go further, and beyond demanding that there always be consent, we also insist on *respect* for your partners. No means no, not just because it's held as a dogmatic rule, but because it reflects a sincere appreciation of the autonomy of other people. We cannot tolerate violations of this essential principle.

While Dr Carrier has been a valued contributor to this network, we have to demand support of that principle in actions as well as words. After a review of the evidence so far, Richard Carrier's posting privileges have been suspended, pending further evaluation, and all comments on his blog have been closed.

If you wish to make a testimonial, pro or con, about Dr Carrier, you can **send them to me** in confidence. We will consider all the evidence before making a final decision on his case.

We also support Skepticon and their commitment to equality and justice. If you do too, **donate**.

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**Plaintiff's
Exhibit 6**

According to your statements, published on Freethought Blogs, you've "been investigating further," and suspended Dr. Carrier's posting privileges "after a review of the evidence so far." But you have no evidence to support these claims, and you engage in logical fallacy, concluding "[w]e believe his accusers." In fact, you have accused Dr. Carrier of a crime involving moral turpitude and lowered his professional reputation. Dr. Carrier vigorously disputes the entirety of these allegations.



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Your statements appear to be, in part, derivative of the claims alleged by Ms. Amy Frank, of the ASU Secular Student Alliance. Ms. Frank's allegations of sexual assault and harassment are false, and contradicted by multiple eyewitnesses, and an independent professional investigation did not conclude assault or harassment occurred.

Claims of this nature require facts, supported by evidence. You have not presented any evidence to support your allegations. Your claims rely solely upon rehashing conclusory or speculative assertions without basis in reality or fact. Moreover, you bear a responsibility, before circulating unverified rumors and innuendo, to make a good faith effort to investigate and substantiate their veracity. As you made no such effort, your statements are defamatory, intentionally reckless and malicious.

Accordingly, we demand that you:

- (1) Immediately cease and desist your unlawful defamation of Dr. Carrier, and
- (2) Within ten days of the date of this correspondence provide us written assurances that you will cease and desist from further defamation of Dr. Carrier's character and reputation, and show proof of all published retractions as specified below, and
- (3) Publish a full written retraction, on Freethought Blogs and every other public forum wherein your defamatory statements were made, including, but not limited to, corrections that:
 - a. Your statements were false as well as misleading, and that
 - b. Ms. Amy Frank's accusation has been contradicted by eyewitnesses, and an independent professional investigation did not conclude assault or harassment had occurred, and that

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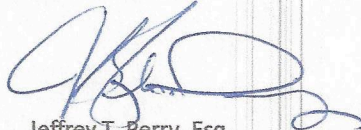
- c. Apart from Ms. Amy Frank's discredited accusation, Dr. Carrier's behavior at conferences and events, including at Skepticon, has never been the subject of any formal complaint by anyone attending or staffing them, for the entirety of his speaking career of more than ten years, and that
- d. Not one of the complaints cited took place at an event or conference, and that
- e. At no time did Dr. Carrier continue behavior he was told was unwanted, and that
- f. The unnamed sources cited rely on nothing more than a single electronic message, in each case within the context of a longstanding friendship between they and Dr. Carrier, and that
- g. Notwithstanding knowledge of a pending investigation, you recklessly circulated unverified accusations without regard as to truth or falsity.

(4) Further, we demand that you reimburse Dr. Carrier's reasonable attorney's fees and costs relative to the above referenced matter.

Once you have had an opportunity to review the contents of this letter, you or your attorney should certainly contact my office to discuss these issues, options, and courses of action. Should we not hear from you or receive your written assurances before the above noted deadline, I will have no choice but to advise my client as to all legal and equitable remedies that he may have available to him in regard to this matter, including, but not limited to, bringing a claim for defamation *per se* with a request for punitive damages.

Please do not attempt to contact Dr. Carrier directly and refer all correspondences instead to my attention. I look forward to working with you in this matter.

Sincere Regards,



Jeffrey T. Perry, Esq.
Campbell Perry, LLC
Supreme Court No.: 0088989

cc: Dr. Richard Carrier
Ed Brayton, Chief Financial Officer, Freethought Blogs Network

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